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October 8, 2019

Via Electronic Filing

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

RE: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Dominion Energy South Carolina, Incorporated's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-41-20(A)
Docket No. 2019-184-E

Dear Ms. Boyd:

Please find attached for electronic filing the *Second Prehearing Brief* filed on behalf of the South Carolina Coastal Conservation League (CCL) and Southern Alliance for Clean Energy (SACE) in the above-referenced matter.

Please contact me if you have any questions concerning this filing.

Sincerely,

s/ Lauren J. Bowen

Lauren J. Bowen

Admitted Pro Hac Vice

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Southern Alliance for Clean Energy*

CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via electronic mail with a copy of the *Second Prehearing Brief* filed on behalf of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 8th day of October, 2019.

s/ Emily Selden
Emily Selden

STATE OF SOUTH CAROLINA

DOCKET NO. 2019-184-E

In re: South Carolina Energy)
 Freedom Act (H. 3659))
 Proceeding to Establish Dominion)
 Energy South Carolina,)
 Incorporated's Standard Offer,)
 Avoided Cost Methodologies,)
 Form Contract Power Purchase)
 Agreements, Commitment to Sell)
 Forms, and Any Other Terms or)
 Conditions Necessary (Includes)
 Small Power Producers as Defined)
 in 16 United States Code 796, as)
 Amended) – S.C. Code Ann.)
 Section 58-41-20(A)

**SECOND PREHEARING BRIEF OF THE
 SOUTHERN ALLIANCE FOR CLEAN
 ENERGY AND SOUTH CAROLINA
 COASTAL CONSERVATION LEAGUE**

Pursuant to South Carolina Public Service Commission (“Commission”) Order No. 2019-108-H, Docket No. 2019-184-E, the South Carolina Coastal Conservation League (“CCL”) and the Southern Alliance for Clean Energy (“SACE”) (collectively, the “Conservation Groups”), through counsel, file this second prehearing brief on certain issues in the current proceeding, which concerns the avoided cost rates for Dominion Energy South Carolina, Inc. (“DESC”).¹

¹ Conservation Groups appreciate the opportunity to file this responsive brief and reserve the right to respond to issues raised by the other parties in surrebuttal testimony or at the evidentiary hearing.

I. Summary of responses to other parties' positions and responses thereto

In general, the parties appear to have identified the same or similar provisions of federal and state law that are at issue in this proceeding.² Conservation Groups take a different position from DESC regarding whether DESC has met these federal and state law requirements, as described in Conservation Groups' initial brief and pre-filed expert testimony. In particular, the parties disagree regarding whether DESC's avoided costs and newly proposed integration charge have been reasonably calculated and are legally sufficient under state and federal law. Conservation Groups' position and reaction to DESC's initial testimony (as summarized in DESC's pre-hearing brief) have been largely set forth in the Conservation Groups' initial pre-hearing brief, the direct testimony filed on September 23, 2019, and surrebuttal testimony currently being prepared by Conservation Groups' expert witness for filing by October 11, 2019. Conservation Groups appreciate the opportunity to file pre-hearing briefs and look forward to further addressing these issues at the hearing and in post-hearing filings.

II. Outstanding procedural issues, including evidentiary issues

Conservation Groups do not have any outstanding procedural or evidentiary issues to identify for the Commission at this time. Conservation Groups are working with the other parties to wrap up any outstanding discovery requests and streamline the hearing process to the extent possible.

III. Brief summary of testimony filed since September 30

² Conservation Groups identified additional relevant provisions beyond those identified by DESC, including FERC Order 69 provisions regarding the difference in revenue requirements ("DRR") method and optimization and provisions of Act 62 regarding the pending grid integration study by the Commission and ORS.

The Conservation Groups have not filed any testimony since September 30, but are in the process of preparing surrebuttal testimony in response to the rebuttal testimony filed by DESC on October 7, 2019. The Conservation Groups will file surrebuttal testimony on or before October 11, 2019.

IV. Description of any stipulations reached or issues not in controversy

The Conservation Groups have not reached any stipulations at this time, but appreciate the opportunity to file this prehearing brief.